

**EXHIBIT "C"**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEBRASKA**

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SAMUEL L. KIMBRIL,

Plaintiff,

Case No.: 8:22-cv-00401

v.

SOURCE MEDIA, LLC and LYNNLEY  
BROWNING,

**DECLARATION OF LEIGH CAMPBELL  
JOYCE IN SUPPORT OF DEFENDANTS'  
NOTICE OF REMOVAL**

Defendants.

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I, Leigh Campbell Joyce, being first duly sworn state that I am more than twenty-one (21) years of age and do not suffer from any legal disability. I have personal knowledge of and am competent to testify about the facts stated in this Declaration.

1. I am an attorney for Defendants Source Media, LLC and Lynnley Browning ("Defendants").
2. I have reviewed Plaintiff's Complaint in this matter, and I am familiar with its allegations.
3. Plaintiff Samuel L. Kimbril names Source Media, LLC as a Defendant. Attached hereto as Exhibit 1 is a true and correct copy of the Delaware Secretary of State's Business Entity Summary for Defendant Source Media, LLC from its website, which reflects that Source Media, LLC has its principal place of business in Wilmington, Delaware and was incorporated, formed, and organized in the State of Delaware. Exhibit 1 is a public record filed with and maintained by the State of Delaware.
4. Defendant Lynnley Browning is a citizen of Illinois and resides at the address listed at Exhibit A (Praecipe for Summons).

**I declare under penalty of perjury that the foregoing is true and correct.**

DATED this 17th day of November 2022.

/s/Leigh Campbell Joyce

Leigh Campbell Joyce

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